

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

LENZIE GILL,)
)
Plaintiff,)
)
vs.) CASE NO: CV-06-1151-MHT
)
PROGRESSIVE DIRECT)
INSURANCE COMPANY,)
)
Defendant.)

MOTION FOR SUMMARY JUDGMENT

Comes now the defendant, Progressive Direct Insurance Company (“Progressive”), pursuant to Rule 56 of the Federal Rules of Civil Procedure and moves the court to enter a summary judgment in its favor on the ground that there is no genuine issue as to any material fact and it is entitled to judgment as a matter of law.

This motion is based upon the pleadings, the Progressive policy, and the affidavit of Larry Lackey. Progressive is submitting a memorandum brief in support of its motion.

/s/ R. Larry Bradford
R. Larry Bradford, Attorney for Defendant
Progressive Direct Insurance Company
Attorney Bar Code: BRA039

/s/ Shane T. Sears
Shane T. Sears, Attorney for Defendant,
Progressive Direct Insurance Company
Attorney Bar Code: SEA026

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that I have this the 16th day of May, 2007, served a copy of the foregoing to all attorneys of record by placing a copy of same in the United States Mail, postage prepaid and properly addressed as follows:

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OF COUNSEL